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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MAR 13 2008 *new*  
MAR 13 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

JAMES M WORTHEM

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

TOM DART (Sheriff C.C.)  
Salvador Gutierrez (D.R.)

Case No: \_\_\_\_\_  
(To be supplied by the Clerk of this Court)

08CV1512  
JUDGE LEINENWEBER  
MAGISTRATE JUDGE COLE

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)**

**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)**

**OTHER (cite statute, if known)**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

A. Name: James Michael Worthem

B. List all aliases: David Scott

C. Prisoner identification number: 20070071905

D. Place of present confinement: Cook County Jail

E. Address: 2700 South California Street, Chicago IL, 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

A. Defendant: Sheriff (c) TOM DART  
Title: Sheriff of Cook County Jail  
Place of Employment: Cook County Jail / Daley Center

B. Defendant: Salvador Godinez  
Title: Director of Cook County Jail  
Place of Employment: Cook County Jail

C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

A. Name of case and docket number: James WERTHEIM v.  
Deputy "Boyle" Case # 07-c-6589

B. Approximate date of filing lawsuit: 11/21/07

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: James M WERTHEIM (AKA) David Scott

D. List all defendants: Deputy "Boyle"

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

F. Name of judge to whom case was assigned: Judge (eiven) Weber

G. Basic claim made: Assault / use of excessive force

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Granted in (eave of forma  
paperis

I. Approximate date of disposition: 2/4/08

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

III Continued \*

- A. James M Worthem v. Supt Hickerson case# 07-C-6687
- B. 11/28/07
- C. James M. Worthem (AKA) David Scott
- D. Supt Hickerson, paramedic Ms. Douglas, yo herrera, etc.
- E. Northern District of Illinois, eastern Division
- F. Your Honorable Judge Leinenweber.
- G. Denial of Adequate Health care.
- H. Granted in leave of forma pauperis
- I. 1/4/07

III - continued \*

- A. James M Worthem v. Jennifer Hall - 07-c-7255
- B. 12/27/07
- C. James M Worthem (AKA) David Scott
- D. Jennifer Hall and Michael Moore
- E. Northern District of Illinois.
- F. ?
- G. Deliberate indifference, gross negligence and const. Amend 8/14th Violations
- H. Still pending.
- I. ?

\* H. Still pending

I. ?

III - cont. \*

- A. James M Worthem v. Tom Dart case# 08C1210
- B. 2/28/08
- C. James M Worthem (AKA) David Scott
- D. Tom, Dart, Salvadore Gardner and C.P.D chief of Police Dana Starks.
- E. Northern District of Illinois
- F. Judge Leinenweber and Magistrate Judge Cole
- G. Posting notice of rights/civil violation.

**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

The C.C.D.O.C. Directors office issued out An illegal memo to each and every single wing throughout the whole compound on 10/26/07 Regarding a co-payment for services that would become effective on 12/1/07 in that all inmates would be required to pay \$10 per visit for Hospitalization and as I did a further investigation on this matter I found that it is illegal Due to my being a pre-trial detainee and I began writing Grievance after Grievance and Just 2 weeks ago from today, the beginning of March or the end of February, officials began removing these memo's Due to what? High Ranking Officials were conducting an extortion scheme in order to cover up for a Captain Kelly of whom got caught and is currently going to court for Stealing Money from the Welfare fund of the Detainees within C.C. Jail and this Captain was also caught Stealing Cleaning supplies and Re-Selling them in Bulk to Various Companies and so Tom Dart and Mr. Godinez figured they'd

Clean up the wrong doings of their Staff Member(s) by attempting to or have taken Money illegally with this Memo that I have obtained and am sending it as evidence of my accusations toward High Ranking officials of whom to me are guilty of official Misconduct and for gross negligence, Reckless Disregard and Deliberate indifference for both Cruel and Unusual Punishment and for the violation of Due process and equal protection clauses of 4th Amend. This is also Racketeering and highly prejudicial.  
~~Tom Dart even made a statement with the newspaper regarding the taking of commissary Money from a Detainee's account last year in 2007.~~

## V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I'd please like the Court to award me with Punitive, Compensatory Damages, and for high ranking officials to Step down from their positions for abusing their Authority and for the violation of my Fed Const Rights against my mental and physical harm. I'd like to be awarded with Attorneys fees and awarded in the amount of \$15 Million Dollars. THANK YOU  YES  NO

VI. The plaintiff demands that the case be tried by a jury.  YES  NO

## CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 5<sup>th</sup> day of March, 2008

James Wortham

(Signature of plaintiff or plaintiffs)

James M Werthem

(Print name)

2007-0071905

(I.D. Number)

JAMES M. WORTHEM

~~REDACTED ADDRESS~~ P.O. Box 089002

Chicago Ill. (60608)  
(Address)

(Address)